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Attorneys for Plaintiffs,  
UTHERVERSE, INC. and BRIAN SHUSTER

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA – RENO DIVISION**

UTHERVERSE, INC., a Nevada corporation,  
BRIAN SHUSTER, an individual,

Plaintiffs,

v.

BRIAN QUINN, an individual; JOSHUA  
DENNE, and individual; BLOCKCHAIN  
FUNDING, INC. a Delaware corporation;  
BLOCKCHAIN ALLIANCE LLC, a  
Wyoming Limited Liability Company;  
MASTERNODE PARTNERS, LLC, a  
Wyoming Limited Liability Company;  
LYNNE MARTIN, an individual; NIYA  
HOLDINGS, LLC, a Nevada limited liability  
company; NIMA MOMAYEZ, an individual;  
and JEREMY ROMA, an individual,

Defendants.

AND RELATED CROSS-CLAIM.

Case No.: 3:25-cv-00020-MMD-CSD

**REQUEST FOR ENTRY OF DEFAULT  
AGAINST JEREMY ROMA**

TO THE HONORABLE COURT AND ALL PARTIES AND THEIR RESPECTIVE  
ATTORNEYS OF RECORD:

Plaintiffs, UTHERVERSE, INC. and BRIAN SHUSTER (collectively, “Plaintiffs”), hereby  
request that the Clerk of the above-entitled Court enter default in this matter against defendant,  
JEREMY ROMA, an individual (hereinafter “Defendant”), pursuant to the Federal Rules of Civil  
Procedure, Rule 55(a). In support of this request, Plaintiffs state the following:

**1. FAILURE TO PLEAD OR OTHERWISE DEFEND:**

On January 25, 2025, Plaintiffs caused the complaint to be served on Defendant,  
evidenced by the proof of service of summons on file with this court (*see* Doc. 28; see  
also Declaration of Sherrie M. Flynn, filed herewith (“Flynn Dec.”). ¶ 4, and Ex. A. The  
time for filing an answer or other response as to Defendant expired on February 17, 2025.  
(*Id.*, ¶ 5.) Defendant has failed to appear or otherwise respond to the complaint within  
the time prescribed by the Federal Rules of Civil Procedure. (*Id.*, ¶ 6.)

**2. REQUEST FOR ENTRY OF DEFAULT:**

In light of Defendant’s failure to respond, Plaintiffs respectfully requests that the Clerk  
enter default against Defendant in accordance with Rule 55(a) of the Federal Rules of  
Civil Procedure.

WHEREFORE, Plaintiffs request the Clerk of the Court enter the default of Defendant,  
JEREMY ROMA, an individual.

Dated: March 21, 2025

By: /s/ Sherrie M. Flynn  
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*Attorneys for Plaintiffs Utherverse, Inc. and Brian  
Shuster*

1 Default entered on (specify date): \_\_\_\_\_

2 CLERK OF THE U.S. DISTRICT COURT  
3 DISTRICT OF NEVADA

4  
5 By: \_\_\_\_\_  
6 Deputy Clerk